

400 MAIN STREET
CHATHAM NEW JERSEY 07928

GINA MENDOLA LONGARZO, ESQ.*
KARA A. MACKENZIE, ESQ.*
FRANCESCA N. MENDOLA, ESQ.

LAW OFFICES OF
GINA MENDOLA LONGARZO, LLC
*ADMITTED NJ & NY BARS

January 21, 2015

Via Electronic Filing

Honorable Steven C. Mannion, U.S.M.J.
Martin Luther King Bldg & US Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: United States v. Jonathan Saba
Case No. 13-06055 (SCM)

Dear Judge Mannion:

This office represents Jonathan Saba in the above matter. I write to request permission on his behalf to visit his dying mother in Lebanon. Mr. Saba's mother, Mrs. Jamale Saba, lives in Beirut, Lebanon and suffers from metastatic breast cancer which has spread to her bones, liver and abdominal system. Tragically, her organ functions are shutting down, and her doctors are now trying to make her comfortable before she passes which they predict is imminent and likely to occur this week. Mr. Saba's siblings and remaining family have all travelled to Lebanon to be with her in these final days, and the family is awaiting Jonathan who would like to see her before she dies, if possible, and attend her memorial services. He is thus asking for approximately two weeks to spend in Lebanon and would leave immediately if his request is granted. Assistant United States Attorney J. Jamari Buxton consents to the proposed travel, and Pretrial Services has taken no position on the request but asked that certain language be included in any proposed order.

Mr. Saba has numerous ties to the United States and New Jersey and presents no flight risk whatsoever. In this regard, we offer the following information to support his application:

1. Mr. Saba's two minor sons reside in New Jersey and are five years old and sixteen months old. His five year old lives with the defendant's ex-wife in Wayne, and he has been embroiled in a longstanding custody and visitation battle with her for the past four years in Passaic County Superior Court. He has spent over \$100,000 in trying to obtain visitation rights with his son and to have him returned to the United States when his ex-wife absconded with him to Germany. He has an upcoming motion return

date this week. Therefore, he will definitely return to the United States as he anxiously awaits visitation with his son after fighting so long and hard to obtain same.

2. Mr. Saba currently resides with his wife, Rima, and their sixteen month old son in Cliffside Park in a rental apartment. He is the sole provider for his family and would not abandon them.
3. Mr. Saba and his wife have been actively looking to buy a home in New Jersey together and have placed an offer on a two family home in Caldwell. They have met with an attorney in reference to the closing should their offer be accepted. They thus wish to set up a permanent residence in New Jersey.
4. Mr. Saba is in the process of opening up an eating establishment in Cliffside Park, a deli/burger restaurant, and has paid an attorney to have a partnership agreement drawn up regarding this business venture and the commercial property involved.
5. Finally, Mr. Saba has never had any issues with Pretrial Services and satisfactorily performed his probation in Bergen County from 2013-2104 with no problems or violations. He has always appeared when required and has no open or outstanding warrants.

Accordingly, because he presents no flight risk and has numerous, significant ties to New Jersey, Mr. Saba earnestly requests that the Court enter the attached Order your to modify the conditions of his release to permit him to travel outside of the United States to Lebanon for a two week period so that he can visit with his terminally ill mother, if she lasts until the time he arrives, and attend her funeral. The government has reviewed the attached order which would allow him to travel to Lebanon tomorrow and has found it acceptable.

Thank you for your courtesy and consideration of this urgent matter.

Respectfully submitted,
/s/Gina Mendola Longarzo
GINA MENDOLA LONGARZO

GML:hs
enclosure

cc: Jamari Buxton, AUSA